

IN THE UNITED STATES COURT OF FEDERAL CLAIMS

HARMON-EL, <i>et al.</i> ,)	
)	
Plaintiffs,)	
)	
v.)	No. 20-1307 C
)	Judge Solomonson
THE UNITED STATES,)	
)	
Defendant.)	
)	
_____)	

DEFENDANT'S RESPONSE TO PLAINTIFFS'
MOTION FOR LEAVE TO FILE AN AMENDED COMPLAINT

Pursuant to Rule 15(b) of the Rules of the Court of Federal Claims, defendant, the United States, respectfully submits this response to the motion for leave to file an amended complaint filed by *pro se* plaintiffs, Xi Chin Clan Nation, Harmon Rhashea Lynn Foreign Trust, The Be Kind and Unified Foreign Family Indigenous Trust, RLH Ma'at Law Office, Guale Yamassee Compliance Department, and Guale Yamassee Juris Consul Office (collectively, plaintiffs). Although the United States does not believe that any amendment is likely to cure the jurisdictional defects in light of the underlying facts so far alleged, considering plaintiffs' *pro se* status, the United States takes no position on plaintiffs' motion for leave to amend.

Respectfully submitted,

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January 4, 2021

Attorneys for Defendant

CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury that on this 4th day of January, 2021, I caused to be placed in the United States mail (first-class, postage prepaid), copies of “Defendant’s Response to Plaintiffs’ Motion for Leave to File an Amended Complaint” addressed as follows:

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